

## **News Corp Alertline Privacy Notice**

News Corp is committed to ensuring ethical business conduct and compliance with applicable legal obligations and its policies.

In connection thereto, News Corp provides a global toll-free telephone number and a secure internet helpline hosted on EthicsPoints secure servers, operated by NAVEX Global, an independent, confidential News Corp service provider (known as the “Alertline”) for use by employees and non-employees (i.e., consultants, independent contractors and freelancers) of News Corp and its affiliates and subsidiaries (together, “the Company”). This Privacy Notice explains how we collect, use and disclose Personal Data in connection with the Alertline. “Personal Data” means any information relating to an identified or identifiable individual that is processed via the Alertline.

### **How To Use the Alertline**

You may use the Alertline to report concerns or raise questions related to suspected violations of the News Corp Standards of Business Conduct or other News Corp business unit policy or applicable law. News Corp appreciates your input and encourages you to report any business conduct concern. All concerns are taken seriously and retaliation against anyone who raises an allegation in good faith is prohibited.

In the European Economic area (“EEA”), use of Alertline may be limited to matters that may significantly affect the interests of the Company with regard to accounting, auditing, banking and other financial matters, matters relating to internal accounting controls and reporting, fraud and misconduct, corrupt practices and financial crime, bribery and insider trading (“Allegations”).

Further, in the EEA, allegations reported through the Alertline should be limited to facts that are relevant for any follow-up investigation. Concerns about actual or suspected non-compliant activity in relation to matters other than the ones listed above may be reported via regular reporting channels made available by your respective business unit. To report other matters, you may contact your manager or Company contact, Human Resources or the Legal Department (either in your Business Unit or at News Corp), your Business Unit’s Compliance Officer or other designated employee who oversees compliance for your business or your Business Unit’s Group Chief Compliance Officer.

If you believe that the circumstances are such that you cannot communicate your concern through the regular reporting channels described above, or the Alertline, you may communicate directly with the Lead Director of the Company’s Board, by addressing such communication in writing to the attention of Lead Director, at News Corporation, 1211 Avenue of the Americas, New York, New York 10036 or by email at [LeadDirector@newscorp.com](mailto:LeadDirector@newscorp.com).

If you are based in Austria, Hungary, Portugal and Sweden, the Alertline should only be used if an Allegation relates to senior management, and where the concerns cannot be addressed by other means. If you are based in Spain, the Alertline should only be used if an Allegation relates to the employment relationship with the Company.

Use of the Alertline is voluntary. The Alertline is available via:

- **Alertline - Global telephone number<sup>1</sup> +1-866-480-6129**
- **Alertline - internet website: <https://newscorp.alertline.com>**

## **Personal Data We Collect**

We collect Personal Data as necessary to pursue our legitimate interests in investigating an Allegation and to comply with legal obligations and our policies.

Allegations made via the Alertline may contain Personal Data, especially employment-related Personal Data (e.g., name, title, relationship to Company, business unit, location, contact details). When you use the Alertline website, you will be prompted to submit your name and contact details (if you do not choose to report anonymously), the nature of your Allegation, and the identity of the individual about whom an Allegation is made. You may also be asked to clarify key points of the facts provided. At the end of your submission, you will be provided with a reference number relating to the Allegation you reported. When you call the Alertline telephone number, a similar information gathering process is conducted by a specialist, who will ask about the nature of your call, to clarify key points and collect further details as required, and take notes during the call to record the facts provided. After the Allegation is submitted, a report is prepared and sent directly to the Alertline Global Response Team in charge of the Alertline in New York, NY, U.S.A. for further investigation. The outcome of the investigation will also be documented in a final report.

We do not knowingly collect sensitive Personal Data (i.e., Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, data concerning sex life or sexual orientation) or data relating to criminal convictions or prosecutions. When you report an Allegation, please try to refrain from submitting such information as much as possible.

## **Anonymous and Non-Anonymous Allegations**

The Company will accept anonymous Allegations only to the extent permitted by applicable law. For example, if you are based in Portugal or Spain, local law does not allow the Company to accept anonymous Allegations.

We encourage submitting non-anonymous Allegations. If you provide your name and contact details, we will be able to contact you if further information is needed. Your identity will be kept confidential and will not be disclosed to the individual about whom an Allegation is made. However, we may be required by applicable law to disclose your identity, if required by court order or in administrative proceedings. Company policy prohibits retaliation against an individual who has made a non-anonymous Allegation through the Alertline in good faith. Any individual using the Alertline should make sure that, to the best of his/her knowledge, the information supplied is correct and asserted in good faith. Knowingly providing inaccurate or misleading information, or otherwise making malicious Allegations, may result in disclosure of your identity, in disciplinary action, or even civil or criminal liability.

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<sup>1</sup> Callers outside the United States must first access the AT&T network before dialing the toll-free number. To obtain your country's AT&T international access code, go to [http://www.business.att.com/bt/international\\_dialing.jsp](http://www.business.att.com/bt/international_dialing.jsp).

## **How We Use and Share Personal Data**

We use the Personal Data for the purposes of managing the Alertline, creating a report and investigating an Allegation. Depending on the nature of the matter, the Alertline Global Response Team may share the report and related documentation with your employer and other appropriate personnel at the Company, such as representatives of Legal, Human Resources, Compliance or Corporate Audit, and/or outside consultants and counsel.

## **How Will You Know If You Are the Subject of an Allegation?**

The Company generally aims, if appropriate and if possible, to notify individuals about whom an Allegation is made so that they may correct any misinformation. Such notice will be provided to the extent that it will not endanger the collection of evidence. It will not include the identity of the individual who submitted the Allegation. Additionally, when appropriate, the Company will provide updates as to the status of the investigation to the individual about whom an Allegation is made.

## **Data Security and Data Retention**

We have implemented technical and organizational measures to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access. We make reasonable efforts to ensure a level of security appropriate to the risk of the data processing, taking into account the costs of implementation and the nature of the processing.

If an Allegation is considered unfounded, the Personal Data associated with the Allegation will be securely destroyed or erased promptly, and where possible within two months after the review of the Allegation (in accordance with the Company's Records Management Policy and applicable Records Retention Schedules). This period may be extended if necessary to complete other procedures and/or to comply with legal requirements.

## **Third Party Service Provider**

The Alertline is available 24 hours a day, 365 days a year, and is operated on behalf of the Company by Navex Global, a service provider in the United States.

We require Navex Global by contract to process Personal Data on our behalf only and to implement appropriate technical and organizational measures to protect the confidentiality and security of your Personal Data in compliance with applicable law. For further information on how Navex Global handles your Personal Data, please click [here](#).

## **Your Rights**

Subject to and as may be provided under applicable laws, you have the right to request access to Personal Data collected about you through the Alertline in order to make appropriate corrections, by contacting your local Human Resources representative or your Business Unit's Compliance Officer or Group Chief Compliance Officer. You may not request access to the identity of the individual who submitted the Allegation. Subject to and as may be provided under applicable laws, you may also request that certain Personal Data about you be rectified, erased or restricted, and you may have the right to object to the processing of your Personal Data on grounds relating to your particular situation. We will respond to your questions or

complaints relating to the processing of your Personal Data. If you are a resident of the European Economic Area (“EEA”) and are not satisfied with our responses, you have the right to lodge a complaint with a supervisory authority. The exercise of your rights may be restricted as necessary to protect others in the context of a particular Allegation.

### **Data Transfers**

We are part of a global organization. Your Personal Data may be transferred to, stored or accessed by Company personnel worldwide for the purpose of managing the Alertline and investigating an Allegation. When your Personal Data are transferred to (or accessed from) a country outside your country of residency, including the EEA, we will implement appropriate safeguards to ensure that your Personal Data remain protected. This may include data transfer agreements, a copy of which you can obtain by contacting us as indicated in the “Contact Us” section below.

### **Contact Us**

The entity responsible for the collection and processing of your Personal Data in the context of the Alertline is News Corporation, 1211 Avenue of the Americas, New York, NY 10036, U.S.A.

If you have any questions or concerns about how your Personal Data is processed in the context of the Alertline, or if you wish to exercise your rights, please contact your [Business Unit’s Data Protection Officer or Business Unit Privacy Leader](#).

For more information on how the Company processes Personal Data in the employment context, please refer to your Business Unit’s Employee Privacy Notice and Non-Employee Privacy Notice, as applicable to you.